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State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
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> STATE OF NEW JERSEY OFFICE OF THE ATTORNEY GENERAL DIVISION OF GAMING ENFORCEMENT DOCKET NO. 12-0679-EL

STATE OF NEW JERSEY, DEPARTMENT OF LAW AND PUBLIC SAFETY, DIVISION OF GAMING ENFORCEMENT,)))
Petitioner,) Civil Action
v. ANTHONY BROWN,) PETITION FOR) PLACEMENT ON EXCLUSION LIST
Respondent.)

Petitioner, State of New Jersey, Department of Law and Public Safety, Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic City, New Jersey, 08401 says:

Respondent, ANTHONY BROWN ("Brown"), is a resident of Massachusetts, having an address of ...

2. <u>N.J.A.C</u>. 13:69G-1.3(a)3 provides, in pertinent, part for the exclusion

of:

any person who has been convicted of a criminal offense.... punishable by more than six months in prison and whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey and of license gaming therein.

3. N.J.A.C. 13:69G-1.3(a)4 authorizes the exclusion of

any person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including

- iii Persons who pose a threat to the safety of the patrons or employee sof a casino licensee
- iv. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees
- 4. On September 22, 2011, Brown was charged in Atlantic County Indictment No. 11-09-2315-DCP with Swindling and Cheating, fourth degree, contrary to N.J.S.A. 5:12-113(a). While playing Texas Hold'em at the Tropicana Casino and Resort, Brown past posted 8 bonus bets and pinched one bonus bet, resulting in Brown winning \$275.00. On December 16, 2011, Brown was convicted of this offense and sentenced to an 18 month suspended sentence, and, further, required to pay certain fines an fees. In

addition, Brown was barred from entering Atlantic City casinos for the duration of the suspended sentence.

- 5. On November 14, 2011, Brown charged with Theft by Unlawful Taking, contrary to N.J.S.A. 2C:20-3a and Criminal Mischief, contrary to N.J.S.A. 2C:17-3a(1). Brown stole a dealer tip box belonging to a dealer at Caesar's Atlantic City. The tip box contained \$100 in gaming cheques. Brown redeemed the cheques at the main cage of Caesar's Atlantic City. On December 27, 2011, Brown failed to appear in Atlantic City Municipal Court, and a warrant was issued for his arrest.
- 6. On November 15, 2011, Brown was arrested and charged with Criminal Trespass, contrary to N.J.S.A. 2C:18-3. Brown entered the Tropicana Hotel and Resort after having been previously evicted. On December 27, 2011, Brown failed to appear in Atlantic City Municipal Court, and a warrant was issued for his arrest.
- 7. Based on information contained in Paragraphs 1 through 6 of this petition, Brown is a person who has been convicted of a criminal offense punishable by more than six months in prison and whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey and of license gaming therein and should be excluded from casino premises pursuant to N.J.A.C. 13:69G-1.3(a)3.
- 8. Based on information contained in Paragraphs 1 through 6 of this petition, Brown is a person whose presence in a licensed casino establishment would be

inimical to the interests of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to N.J.A.C.13:69G-1.3(a)4.

WHEREFORE, Petitioner demands the following relief against Respondent, Anthony Brown:

- A. Judgment that the Respondent, Anthony Brown, is a person who has been convicted of an offense punishable by more than 6 months in jail and whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C.13:69G-1.3(a)3;
- B. Judgment that the Respondent, Anthony Brown, is a person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C.13:69G-1.3(a)4;
- C. Judgment entering a Final Order placing Respondent, Anthony Brown, on the exclusion list pursuant to N.J.S.A. 5:12-71(I) and N.J.A.C.13:69G-1.3(a)3 and 13:69G-1.3(a)4; and,

D. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

JEFFREY S. CHIESA

Attorney General of New Jersey

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Brian C. Biscieglia

Deputy Attorney General

Dated 9/11/12